

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PACE-O-MATIC, INC.,	:	
	:	
Plaintiff,	:	
v.	:	Docket No. 1:20-cv-00292
	:	
ECKERT SEAMANS CHERIN & MELLOTT, LLC, MARK S. STEWART, and KEVIN M. SKJOLDAL,	:	
	:	(Judge Jennifer P. Wilson)
Defendants.	:	
	:	

ORDER

AND NOW, this ____ day of _____, 2021, upon consideration of the Unopposed Motion of Defendants for Enlargement of Time to Respond to Plaintiff's Amended Motion for Preliminary Injunction, it is hereby ORDERED that the Motion is GRANTED. Defendants shall have until Friday, October 22, 2021 to file their response to Plaintiff's Amended Motion for Preliminary Injunction.

BY THE COURT:

Jennifer P. Wilson, U.S.D.J.

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PACE-O-MATIC, INC.,	:	
	:	
Plaintiff,	:	
v.	:	Docket No. 1:20-cv-00292
	:	
ECKERT SEAMANS CHERIN &	:	
MELLOTT, LLC, MARK S. STEWART,	:	(Judge Jennifer P. Wilson)
and KEVIN M. SKJOLDAL,	:	
	:	
Defendants.	:	
	:	

**UNOPPOSED MOTION OF DEFENDANTS
FOR ENLARGEMENT OF TIME TO RESPOND TO
PLAINTIFF’S AMENDED MOTION FOR PRELIMINARY INUNCTION**

Defendants, Eckert Seamans Cherin & Mellott, LLC (“Eckert”), Mark S. Stewart, and Kevin M. Skjoldal (collectively, “defendants”), by and through their counsel, Fox Rothschild LLP, hereby move this Court for a one (1) week enlargement of time to respond to the amended motion for preliminary injunction of plaintiff, Pace-O-Matic, Inc. (“POM”). In support thereof, defendants allege as follows:

1. This is a breach of fiduciary action filed by POM against defendants.
2. POM filed its Amended Complaint in this action on August 3, 2021.
3. On August 27, 2021, defendants filed a partial motion to dismiss, which is still pending.

4. On September 17, 2021, POM filed an amended motion for preliminary injunction (“Amended Motion”), and on October 1, 2021, POM filed its brief in support of its Amended Motion.

5. Under the Local Rules for the United States District Court for the Middle District of Pennsylvania, Eckert’s response to the Amended Motion would be due on October 15, 2021.

6. Defendants seek a one (1) week extension to file its response to POM’s Amended Motion.

7. Defendants, thus, seek an extension until October 22, 2021 to respond to POM’s Amended Motion.

8. Counsel for defendants requested POM’s consent for the one (1) week enlargement of time, and counsel for POM agreed to the extension.

WHEREFORE, defendants respectfully request that this Court grant their motion and permit defendants an additional week, or until October 22, 2021, to file their response to the amended motion for preliminary injunction filed by plaintiff, Pace-O-Matic, Inc.

A handwritten signature in blue ink, appearing to be 'AR', with a long horizontal stroke extending to the right.

ABRAHAM C. REICH, ESQUIRE (No. 20060)
ROBERT S. TINTNER, ESQUIRE (No. 73865)
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**Counsel for Defendants,
ECKERT SEAMANS CHERIN & MELLOTT,
LLC, MARK S. STEWART, KEVIN M.
SKJOLDAL**

Date: October 7, 2021

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PACE-O-MATIC, INC.,

Plaintiff,

v.

ECKERT SEAMANS CHERIN &
MELLOTT, LLC, MARK S. STEWART,
and KEVIN M. SKJOLDAL,

Defendants.

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Docket No. 1:20-cv-00292

(Judge Jennifer P. Wilson)

CERTIFICATE OF CONCURRENCE

I, Robert S. Tintner, Esquire, hereby certify that I sought the concurrence of counsel for plaintiff, Daniel T. Brier, Esquire, in this motion. Mr. Brier does not oppose the relief sought in in this motion.



ROBERT S. TINTNER, ESQUIRE

Dated: October 7, 2021

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	:	
ECKERT SEAMANS CHERIN & MELLOTT, LLC, MARK S. STEWART, and KEVIN M. SKJOLDAL,	:	(Judge Jennifer P. Wilson)
	:	
Defendants.	:	
	:	

CERTIFICATE OF SERVICE

I, Robert S. Tintner, Esquire, hereby certify that, on this 7th day of October, 2021, I served a true and correct copy of the foregoing Unopposed Motion for Enlargement of Time, via ECF, upon the following:

Daniel T. Brier, Esquire
Donna A. Walsh, Esquire
Myers, Brier & Kelly, LLP
425 Spruce Street, Suite 200
Scranton, PA 18503

**Counsel for Plaintiff
PACE-O-MATIC, INC.**



ROBERT S. TINTNER, ESQUIRE